



April 7, 2025

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VIA ECF

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The Hon. Jennifer L. Rochon
United States District Judge
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

RE: Gordon Surgical Group v. Empire HealthChoice, 24-cv-08551

Dear Judge Rochon:

We represent Plaintiff in this lawsuit. We jointly submit this letter with Defendants' counsel to request a stay of this action while the parties continue to negotiate a global resolution of Plaintiff's claims in this case and the other cases pending before other courts in this District.

It has taken the parties longer than anticipated to reach a resolution given the number of claims at issue and the age of some of those claims. Thus, in the interest of judicial economy and so as to not further burden the Court, the parties respectfully request a 90-day stay of this action, including all conferences and deadlines. The parties will endeavor to finalize settlement and file a stipulation of dismissal within those 90 days.

We thank Your Honor for your consideration of this matter.

Respectfully,

A handwritten signature in blue ink, reading "Roy W. Breitenbach".

Roy W. Breitenbach

RWB:

cc: Valerie Sirota, Esq.

The request is GRANTED. The initial pretrial conference is rescheduled to **July 22, 2025 at 2:00 p.m.**

Date: April 8, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Jennifer L. Rochon".
JENNIFER L. ROCHON
United States District Judge